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April 13, 2023

**Via ECF**

Hon. Lee G. Dunst, U.S.M.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Agudelo v. Recovco Mortgage Management LLC et al.*, No. 22 Civ. 4004  
Request for Extension of Time

Dear Judge Dunst:

The parties write pursuant to the Court's Order of March 23, 2023 directing the parties "to file all necessary paperwork regarding the proposed amended complaint and motion for settlement approval by 4/14/2023." The parties respectfully request an extension to April 25, 2023 to file the above-referenced papers. This is a joint application and the parties' first.

The parties are mindful of Rule II(E) of the Court's Individual Practice Rules requiring such an application be made at least three business days prior to the deadline. We were hopeful to meet the Court's deadline but need additional time to finalize the draft documents and iron out some of the finer points of the proposed settlement. Defendants expect to provide a draft settlement agreement on Tuesday, April 18, which will allow Plaintiffs to complete their preliminary approval papers. I note that Mr. Menken and I are also both unavailable on April 20 and 21.

We note that the parties are operating under a seven-page Memorandum of Understanding that has been executed by counsel for all parties (including the putative California parties).

Respectfully submitted,

/s/ *Scott Simpson*  
Scott Simpson

cc: All counsel (by ECF)